

**Colorado
AFCARS Assessment Review Report**

October 2006

**Prepared by:
Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

Executive Summary

From June 5 - 9, 2006, staff of the Children's Bureau, Administration for Children and Families (ACF) Region VIII, and the Office of Information Services (OIS) conducted an assessment review of Colorado's Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the Trails (not an acronym) system. The AFCARS data used for the review was from the report period April 1 - September 30, 2006 (2005B).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements and 26 of the 27 AFCARS general requirements is assessed on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element and general requirement. A scale of zero (State's SACWIS does not collect one or both of the AFCARS files) to four (fully meets AFCARS standards) is used to assign a factor to each element. A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings" matrices for the general requirements, the foster care and adoption data elements (Tab A). The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

General Requirements (26)

Rating Factor	Foster Care	Adoption	Technical
4	8	3	13
3	0	0	2
2	0	0	0
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	15 (23%)	13 (35%)	28 (27%)
3	27 (41%)	4 (11%)	31 (30%)
2	24 (36%)	20 (54%)	44 (43%)
1	0	0	0

There are several elements requiring additional technical corrections. This may involve a screen design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface. The State made some of the technical corrections

after the on-site visit and submitted revised documentation to ACF. Based on these changes, some elements went from a rating factor of “2” to “3” or a “4.” The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

Additionally, during the post site-visit analysis of the State’s information, a few additional errors were found that changed the initial onsite preliminary rating factors. In a couple of instances, the rating factor went from either a “4” or a “3” to a “2.” If there are questions regarding the findings, the State should contact Angelina Palmiero of the Children’s Bureau. Some of the changes in rating factors were due to the results of the case file review analysis.

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. The State’s semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data in a timely manner, increase supervisory oversight, and assess the validity of the data prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency’s responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the Regional Office, OIS, and the Children’s Bureau with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to the Regional Office and the Children’s Bureau.

The State should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the State with another set of test cases. These scenarios test the technical changes made to the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

TABLE OF CONTENTS

Background	1
Rating Factors	2
Findings	3
Conclusion	6
 Tab A Detailed Findings	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	
Section 3: Case Files	
 Tab B AFCARS Improvement Plan	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	
 Tab C State's Disability Code	

BACKGROUND

Data for the adoption and foster care analysis and reporting system (AFCARS) is required by Federal law and regulation. The data are to be collected on children in foster care and those who have been adopted under the auspices of the State child welfare agency. States that fail to meet any of the standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial compliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E State plan and are subject to penalties.¹ Additionally, States that received funding to develop, implement, and operate a statewide automated child welfare information system (SACWIS) under Federal regulations 45 CFR 1355.53 are to produce a comprehensive, effective, and efficient system to improve the program management and administration of the State plans for titles IV-B and IV-E. At a minimum, the system must provide for effective management, tracking, and reporting by providing automated procedures and processes to, among other things, meet the adoption and foster care reporting requirements through the collection, maintenance, integrity checking, and electronic transmission of the data elements specified by the AFCARS requirements.

The Children's Bureau is committed to assisting States to develop statewide child welfare information systems and to collect quality data. To this end, SACWIS and AFCARS Assessment Reviews (AAR) were developed to assure that the systems support the management of the programs under titles IV-B and IV-E and can produce accurate and reliable foster care and adoption data. AFCARS Assessment Reviews are conducted in every State, regardless of whether a State operates a SACWIS. The State's information system is assessed against the AFCARS requirements in the Federal regulation, policy issuances, and the AFCARS Technical Bulletins. The AAR evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the ACF. A second focus of the AAR is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data is also compared against a small, randomly

¹ The Administration for Children and Families is not assessing AFCARS penalties at this time (see ACYF-CB-IM-02-03) and will not take penalties until new, final AFCARS regulations are issued implementing P.L.108-145 (The Adoption Promotion Act of 2003).

selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements, and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of zero (the system is not collecting the AFCARS data elements and the data are not transmitted) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

RATING FACTOR	DEFINITION
4	All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.
3	There are data quality issues. For example: <ul style="list-style-type: none">• The data are underreported due to inconsistent data entry.• The data are not being entered.• Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens.• There are no supervisory controls for ensuring data entry, or accurate data entry.• Incorrect data entry due to training or design issues.• Missing or incomplete data due to conversion errors.
2	The technical requirements for AFCARS reporting are not fully met. For example: <ul style="list-style-type: none">• The State information system has the capability to collect the data, but the program logic is incorrect.• The State uses defaults for blank information.

	<ul style="list-style-type: none"> • Information is coming from the wrong module or field in the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information. • The extraction code for the AFCARS report selects and reports incorrect data.
1	<p>An AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the information. • There is 100% missing data according to the frequency report or DCU/DQU reports.
0	<p>States operating an automated information system for which they received SACWIS-level FFP were found to be using an external automated information system, or a database (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS system. In addition, there is no program code for the extraction of data from the SACWIS.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 0 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS

requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period April 1, 2005 - September 30, 2005 (2005B).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, team member notes, and the States' corrected program code were assessed to make the final determination of findings. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

Data Elements

There are several elements requiring additional technical corrections. Overall, 43% of the data elements received a rating factor of two; 24 (36%) foster care elements and 20 (54%) adoption elements require system and program code modifications. This may involve a screen design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface. Additionally, 30% of the data elements received a rating factor of three; 27 (41%) foster care and 4 (11%) adoption elements require additional training and supervisory oversight for the timeliness and accuracy of data entry.

The State made some of the technical corrections after the on-site visit and submitted revised documentation to ACF. Based on these changes, some elements went from a rating factor of "2" to "3" or a "4." The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

Additionally, during the post site-visit analysis of the State's information a few additional errors were found that changed the initial onsite preliminary rating factors. In a couple of instances, the rating factor went from either a "4" or a "3" to a "2." If there are questions regarding the findings, the State should contact Angelina Palmiero of the Children's Bureau. Some of the changes in rating factors were due to the results of the case file review analysis.

Technical Areas

- Child Disability Information (Foster Care Elements #10 - 15)

For AFCARS reporting purposes, the information reported for these elements reflect chronic and/or significant diagnosed conditions that the child may have. There are several issues with how these data are recorded in the system. One issue that may be contributing to the inaccuracy of the data is that there is not a question in Trails for case workers to complete as to whether or not a child has been diagnosed with a medical, psychological, or behavioral condition. Instead, the extraction code selects the response to foster care element #10, "has the child been diagnosed with a disability," based on whether any diagnosed conditions are entered into the system. This approach is providing a false "no" response because missing data are mapped to "no" instead of

blank. The State should add the question to the system, preferably where all information regarding a child's health is located.

During the site visit, the State and Federal team discussed various options to improve the collection of this data. One idea is to add an internal edit to the system between the screens recording diagnosed conditions and the one for recording placement settings. If a case worker selects a therapeutic foster care setting for the child's placement, and if no diagnosed condition has been entered on the "characteristics" screen, a pop-up message is displayed that reminds a worker to complete the information on the "characteristics" screen.

The State also has conditions that should be mapped to AFCARS that are currently not included. Tab C provides additional information on which State values can be mapped to AFCARS and to which category in element #11 – 15.

Lastly, this is an area for ongoing training and supervisory oversight in order to ensure the accurate and timely entry of data. Staff need to be instructed to enter this information based on reports received by licensed professionals conducting the evaluation, and not on whether or not the child/family identifies health conditions.

- Removal episode information (Foster Care Elements #18 – 22, and #56 – 58)

For AFCARS, a removal episode is defined as the period of time between when a child has been removed from his or her home for more than 24 hours, until the point in time the agency no longer has responsibility for care and placement of the child. An issue identified by the staff of the Division of State Systems as part of the Statewide Automated Child Welfare Information System (SACWIS) Assessment Review also has implications for the AFCARS data on removal episodes.

The issue relates to how cases in which a child that is under the agency's responsibility for care and placement is ordered into a juvenile justice setting (such as a detention center). In these situations, case management activities are carried out by the youth corrections staff. The youth corrections staff also uses Trails. However, due to the way Trails was designed, the child welfare case worker ends the removal status (Trails was designed with an edit requiring the case to be closed). A "new" removal is entered by the youth corrections worker with the exact same day of removal that previously was entered, even though there was never a break in the Department's² responsibility for care and placement of the child. Once the child has completed his/her time at the detention center, and the child moves into another foster care setting, the child welfare staff would then resume case management activities. The current process could potentially over-count the number of removal episodes. Additionally it is duplicative data entry.

The State has been addressing the problem by telling youth corrections workers to enter the same removal date that was entered by the child welfare worker for the current removal episode. While the State has a project request order to modify Trails, there is not a projected completion

² Colorado's Department of Human Services (CDHS) is the title IV-B/E single-State agency, which includes the State's juvenile corrections system and child and family services.

date for the modifications. The State must include a projected completion date when they submit the initial AFCARS Improvement Plan's estimated due dates. This date will be reviewed and approved/disapproved by the AFCARS review team and the Division of State System's Analyst for the State.

Another issue related to the removal episode affects the actual removal date for AFCARS reporting. In instances where the child's first living arrangement is a hospital or a locked facility at the time the agency obtains responsibility for care and placement, the program code extracts the date the child entered the hospital or locked facility as the removal date. The program code must be modified to extract the date the child is placed in a foster care setting. For AFCARS reporting purposes, the removal episode does not begin until the child is placed in a "foster care setting."

- Relationship of Adoptive Parent(s) to Child (Adoption Element #29 – 32)

AFCARS allows for the selection of more than one relationship type between the adoptive parents and the child. The options are: "stepparent," "other relative," "foster parent," or "other non-relative." The State's system only allows the worker to select one relationship. The selection options and the program code must be modified to allow the worker to select, and the reporting of, more than one relationship.

Data Quality

- Circumstances associated with removal (Foster Care Elements #26 – 40)

Another area that appears to be significantly underreported is the circumstances associated with removal. The case file review findings indicate there were generally more conditions present that contributed to the child's removal than what is being recorded in the system. The State needs to provide additional training and oversight to ensure all conditions, alleged or substantiated, that were present are entered into Trails.

- Caretaker Information (Foster Care elements #44 – 46)

There were several records as part of the case file review in which the AFCARS data indicated a response of "unable to determine," but the reviewers found the caretaker's family structure and the dates of birth. For AFCARS reporting purposes, "unable to determine" should only be used if the child was abandoned.

CONCLUSION

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data in a timely manner, increase supervisory oversight, and assess the validity of the data prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may

utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Another area related to data quality is the accuracy of data converted from other systems or paper files to Trails. There were several errors related to older cases not having the correct dates of first removal or the termination of parental rights. The State must focus on reviewing all open cases that the current removal episode started prior to the State's conversion to Trails. The accuracy of the data is important for accurate assessment of how well services are meeting the needs of children and their families.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the finding(s), the task(s), the date the task is estimated to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the Regional Office, the Children's Bureau and OIS with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to Susan Blumberg in the ACF Regional Office and Angelina Palmiero in the Children's Bureau.

Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). Once the State has completed the AIP, notify the ACF Regional Office. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted as changes to the system and training are addressed, and after all system changes and training are completed. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions based on the test cases have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.